

Federal Communications Commission Washington, D.C. 20554  <div style="text-align: center;"><b>FCC 301</b></div>	Approved by OMB 3060-0027 (July 2011)  FOR FCC USE ONLY
<div style="text-align: center;"><b>APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION</b></div> Read INSTRUCTIONS Before Filling Out Form	FOR COMMISSION USE ONLY FILE NO. -

**Section I - General Information**

1. Legal Name of the Applicant SUNNYLANDS BROADCASTING LLC  Mailing Address P O BOX 2308  <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">City RANCHO MIRAGE</td> <td style="width: 30%;">State or Country (if foreign address) CA</td> <td style="width: 20%;">ZIP Code 92270 -</td> </tr> <tr> <td>Telephone Number (include area code) 2067905405</td> <td colspan="2">E-Mail Address (if available)</td> </tr> <tr> <td>FCC Registration Number: 0020104782</td> <td>Call Sign NEW</td> <td>Facility ID Number 198714</td> </tr> </table>	City RANCHO MIRAGE	State or Country (if foreign address) CA	ZIP Code 92270 -	Telephone Number (include area code) 2067905405	E-Mail Address (if available)		FCC Registration Number: 0020104782	Call Sign NEW	Facility ID Number 198714
City RANCHO MIRAGE	State or Country (if foreign address) CA	ZIP Code 92270 -							
Telephone Number (include area code) 2067905405	E-Mail Address (if available)								
FCC Registration Number: 0020104782	Call Sign NEW	Facility ID Number 198714							
2. Contact Representative (if other than Applicant) GREGG P SKALL, ESQ.  Mailing Address 1025 CONNECTICUT AVE, NW, SUITE 1011 SUITE 1011  <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">City WASHINGTON</td> <td style="width: 30%;">State or Country (if foreign address) DC</td> <td style="width: 20%;">ZIP Code 20036 -</td> </tr> <tr> <td>Telephone Number (include area code) 2027893121</td> <td colspan="2">E-Mail Address (if available) GSKALL@TLP.LAW</td> </tr> </table>	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -	Telephone Number (include area code) 2027893121	E-Mail Address (if available) GSKALL@TLP.LAW				
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 -							
Telephone Number (include area code) 2027893121	E-Mail Address (if available) GSKALL@TLP.LAW								
3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Other AMENDMENT <input type="radio"/> N/A (Fee Required)									
4. <b>Application Purpose</b>  <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="radio"/> New station   <input type="radio"/> Major Modification of construction permit  <input type="radio"/> Minor Modification of construction permit  <input type="radio"/> Major Amendment to pending application            (a) File number of original construction permit:             (b) Service Type:             (c) Community of License:                City: RAYMOND            (d) Facility Type         </td> <td style="width: 50%; vertical-align: top;"> <input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments  <input type="radio"/> Major Change in licensed facility  <input type="radio"/> Minor Change in licensed facility  <input checked="" type="radio"/> Minor Amendment to pending application            BNPH-20150824ABA <input type="checkbox"/> NA   <input type="radio"/> AM    <input checked="" type="radio"/> FM             State: WA  <input checked="" type="radio"/> Main    <input type="radio"/> Auxiliary         </td> </tr> </table> <p>If an amendment, <b>submit as an Exhibit</b> a listing by Section and Question Number the portions of the pending application that are being revised.</p>	<input type="radio"/> New station  <input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application (a) File number of original construction permit:  (b) Service Type:  (c) Community of License: City: RAYMOND (d) Facility Type	<input type="radio"/> New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Change in licensed facility <input checked="" type="radio"/> Minor Amendment to pending application BNPH-20150824ABA <input type="checkbox"/> NA  <input type="radio"/> AM <input checked="" type="radio"/> FM  State: WA <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary							
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[Exhibit 1]

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

## Section II - Legal

1.	<b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No										
2.	<b>Parties to the Application.</b> a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.											
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.</p> </div> <div style="width: 48%;"> <p>(2) Citizenship.</p> <p>(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's <b>equity/debt plus</b> standard, etc.</p> <p>(4) Percentage of votes.</p> <p>(5) Percentage of total assets (equity plus debt).</p> </div> </div> <p>[Enter Parties/Owners Information]</p>												
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(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets								
SUNNYLANDS BROADCASTING LLC, P O BOX 53248, BELLEVUE, WA 98015	US	APPLICANT	0	0								
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(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets								
DSH MANAGEMENT, LLC, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	MEMBER AND MANAGER	50.0	50.0								
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(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets								
DAVID E. HARTMAN, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	MEMBER AND 3% MEMBER AND	1.5	1.5								

		MANAGER OF DSH MANAGEMENT, LLC		
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
37TH AVENUE GROUP LLC, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER AND MANAGER	50	50
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
ELIZABETH DORNAY IRREVOCABLE TRUST, ELIZABETH DORNAY, TRUSTEE, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	MEMBER OF DSH MANAGEMENT, LLC	14.5	14.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
BENJAMIN HARTMAN IRREVOCABLE TRUST, BENJAMIN HARTMAN, TRUSTEE, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	MEMBER OF DSH MANAGEMENT, LLC	14.5	14.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
HARTMAN GRANDCHILDREN'S IRREVOCABLE TRUST, ELIZABETH DORNAY AND BENJAMIN HARTMAN, CO-TRUSTEES, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	MEMBER OF DSH MANAGEMENT, LLC	19.5	19.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
GREGORY J. SMITH, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER AND MANGER OF 37TH AVENUE GROUP LLC	0.5	0.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
CAROL J. SMITH, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	0.5	0.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
PATRICIA THURMAN, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	8	8
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
ANGELA KOPLAN, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	8	8
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
WALTER SMITH, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP	8	8

		LLC		
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
GWYN SCHNEIDER, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	8	8
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
DENISE DEBLIECK, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	8	8
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
RUSSELL SMITH, 121 POWDER CAP CT. CLE ELUM WA 98922	US	MEMBER OF 37TH AVENUE GROUP LLC	8	8
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
BENJAMIN HARTMAN, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	TRUSTEE	24.25	24.25
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
ELIZABETH DORNAY, 600 UNIVERSITY STREET, SUITE 2520	US	TRUSTEE, ELIZABETH DORNAY IRREVOCABLE TRUST	24.5	24.5
(1) Name and Address	(2) Citizenship	(3) Positional Interest	(4) Percentage of Votes	(5) Percentage of Assets
BENJAMIN HARTMAN, 600 UNIVERSITY STREET, SUITE 2520, SEATTLE, WA 98101	US	TRUSTEE, BENJAMIN HARTMAN IRREVOCABLE TRUST	24.5	24.5
b. Applicant certifies that equity and financial interests not set forth above are non-attributable.				
			<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 2]	
3.	<b>Other Authorizations.</b> List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.			<input type="checkbox"/> N/A [Exhibit 3]
4.	<b>Multiple Ownership.</b>			
a.	Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?			<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 4]

	If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.	
b.	<p>Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.</p> <p>Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p> <p>All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No  [Exhibit 5]
c.	<p>Applicant certifies that the proposed facility:</p> <p>(1) does not present an issue under the Commission's policies relating to media interests of immediate family members;</p> <p>(2) complies with the Commission's policies relating to future ownership interests; and</p> <p>(3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]
d.	<p>Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. § 121-201), and holds:</p> <p>(1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or</p> <p>(2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or</p> <p>(3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?</p> <p>All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.</p>	<input type="radio"/> Yes <input checked="" type="radio"/> No See Explanation in [Exhibit 7]
5.	<p><b>Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <p>a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or</p> <p>b. any pending broadcast application in which character issues have been raised.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 8]
6.	<p><b>Adverse Findings.</b> Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 9]
7.	<p><b>Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 10]
8.	<p><b>Program Service Certification.</b> Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
9.	<p><b>Local Public Notice.</b> Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No
10.	<p><b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R.</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

	Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.  <b>An exhibit is required unless</b> this question is inapplicable.	[Exhibit 11]
11.	<b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
12.	<b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
13.	<b>Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.</b> If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
14.	<b>Tribal Priority - Threshold Qualifications.</b> Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A  [Exhibit 12]

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing GREG SMITH	Typed or Printed Title of Person Signing MANAGER
Signature	Date 9/10/2021

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

<b>Section III-B - FM Engineering</b>	
<b>TECHNICAL SPECIFICATIONS</b>	
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
<b>TECH BOX</b>	
1.	Channel Number: 293
2.	Class (select one): <input checked="" type="radio"/> A <input type="radio"/> B1 <input type="radio"/> B <input type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C <input type="radio"/> D
3.	Antenna Location Coordinates: (NAD 27)  Latitude: Degrees 46 Minutes 41 Seconds 43 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 123 Minutes 46 Seconds 22 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Proposed Allotment or Assignment Coordinates: (NAD 27) <input type="checkbox"/> Not Applicable

	Latitude: Degrees 46 Minutes 46 Seconds 10 <input checked="" type="radio"/> North <input type="radio"/> South  Longitude: Degrees 123 Minutes 51 Seconds 59 <input checked="" type="radio"/> West <input type="radio"/> East											
5.	Antenna Structure Registration Number: 1042448 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
6.	Overall Tower Height Above Ground Level:								33meters			
7.	Height of Radiation Center Above Mean Sea Level:								374 meters(H)		374 meters(V)	
8.	Height of Radiation Center Above Ground Level:								24meters(H)		24meters(V)	
9.	Height of Radiation Center Above Average Terrain:								286meters(H)		286meters(V)	
10.	Effective Radiated Power:								0.3 kW(H)		0.3 kW(V)	
11.	Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable (Beam-Tilt Antenna ONLY)								kW(H)		kW(V)	
12.	Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) Rotation (Degrees): <input type="checkbox"/> No Rotation											

Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	
Additional Azimuths											

[Relative Field Polar Plot](#)

**NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.**

**CERTIFICATION**

**AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.**

13.	<b>Availability of Channels.</b> The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 27]
14.	<b>Community Coverage.</b> The proposed facility complies with 47 C.F.R. Section 73.315.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 28]
15.	<b>Main Studio Location.</b> The proposed main studio location complies with 47 C.F.R. Section 73.1125.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 29]
16.	<b>Interference.</b> The proposed facility complies with all of the following applicable rule sections: Check all those that apply:  <b>Separation Requirements.</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 30]



<input checked="" type="checkbox"/>	a) 47 C.F.R. Section 73.207	
<b>Grandfathered Short-Spaced.</b>		
<input type="checkbox"/>	b) 47 C.F.R. Section 73.213(a) with respect to station(s):	[Exhibit 31]
<b>Exhibit required</b>		
<input type="checkbox"/>	c) 47 C.F.R. Section 73.213(b) with respect to station(s):	[Exhibit 32]
<b>Exhibit required</b>		
<input type="checkbox"/>	d) 47 C.F.R. Section 73.213(c) with respect to station(s):	[Exhibit 33]
<b>Exhibit required.</b>		
<b>Contour Protection</b>		
<input checked="" type="checkbox"/>	e) 47 C.F.R. Section 73.215 with respect to station(s):	[Exhibit 34]
<b>Exhibit required.</b>		

17.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an <b>Exhibit is required.</b>  By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 35]
18.	<b>Community of License Change - Section 307(b).</b> If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of station assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).  <b>An exhibit is required</b> unless this question is not applicable.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A  [Exhibit 36]

**PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.**

### SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name ERIK C. SWANSON, P.E.		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 9/8/2021	
Mailing Address HATFIELD & DAWSON CONSULTING ENGINEERS 9500 GREENWOOD AVE N			
City SEATTLE	State or Country (if foreign address) WA	Zip Code 98103 -	
Telephone Number (include area code) 2067839151		E-Mail Address (if available) ESWANSON@HATDAW.COM	



WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

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## Exhibits

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### Attachment 2

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#### Exhibit 3

**Description:** OTHER ATTRIBUTABLE INTERESTS OF APPLICANT

SEE EXHIBIT 5

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### Attachment 3

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### Attachment 4

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#### Exhibit 5

**Description:** RADIO MULTIPLE OWNERSHIP COMPLIANCE

THE PROPOSED FACILITY WILL OPERATE OUTSIDE ANY RATED MARKET, AND DOES NOT HAVE PRINCIPAL COMMUNITY CONTOUR OVERLAP WITH ANY OTHER ATTRIBUTABLE STATION. THEREFORE, NO FURTHER ANALYSIS IS REQUIRED IN ORDER TO DEMONSTRATE COMPLIANCE WITH SECTION 73.3555(A).

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### Attachment 5

Description
<a href="#">Sunnylands Broadcast Multiple Interests Exhibit</a>

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#### Exhibit 11

**Description:** SUNNYLANDS BROADCAST WINNING BIDDER AUCTION EXHIBIT

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### Attachment 11

Description
<a href="#">Sunnylands Broadcast Winning Bidder Auction Exhibit</a>

---

#### Exhibit 28

**Description:** COMMUNITY COVERAGE

PLEASE SEE CONTOUR MAP AT EXHIBIT 30

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### Attachment 28

Description
<a href="#">RAYMOND 300A CONTOUR MAP</a>

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#### Exhibit 30

**Description:** RAYMOND 293A ENGINEERING

PLEASE NOTE THAT THE COORDINATES ARE ENTERED INTO THE CDBS FORM AS NAD83 DATUM

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### Attachment 30

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Description
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<a href="#"><u>RAYMOND 293A ENGINEERING MATERIAL</u></a>
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**Exhibit 34**

**Description:** SECTION 73.215

PLEASE SEE EXHIBIT 30.

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**Attachment 34**

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**Exhibit 35**

**Description:** ENVIRONMENTAL

PLEASE SEE EXHIBIT 30.

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**Attachment 35**

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**SUNNYLANDS BROADCASTING, LLC**  
Broadcast Multiple Interests Exhibit

Sunnylands Broadcasting is the licensee of two (2) full power radio stations, one AM and one FM and four (4) FM translators, all listed below. §73.3555(a) permits a licensee to hold one AM and one FM under any market size.

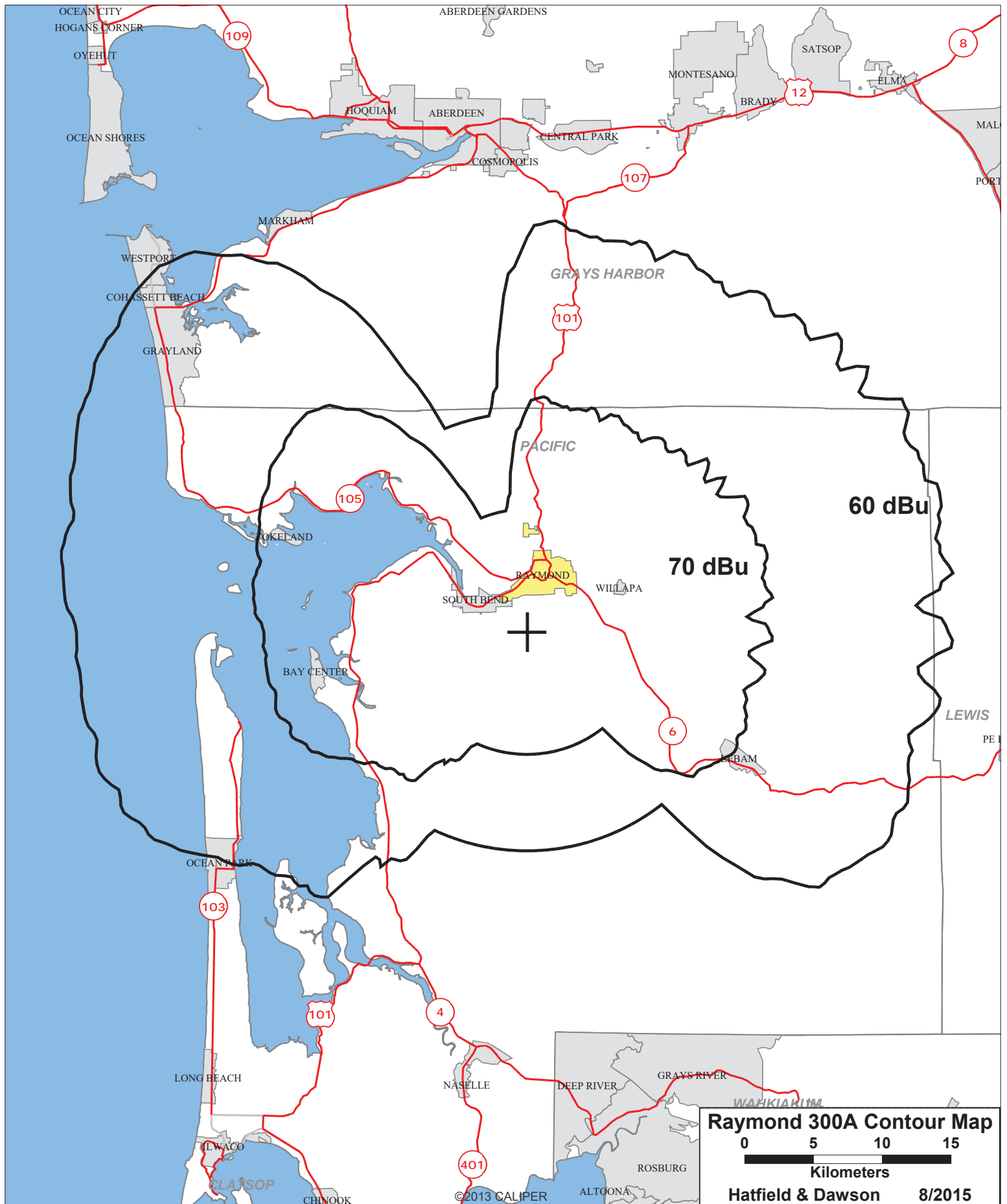
Likewise, Raymond and Trout Lake WA are separated by over 100 miles and a two FM stations would be permitted to be owned by the same licensee under and provision of §73.355(a).

Licensee 	Calls (Click for Details) 	Frequency 	Service 	City 	State 	Facility ID 
<a href="#">SUNNYLANDS BROADCASTING, L.L.C.</a>	<a href="#">K292HN</a>	106.3 MHz Ch. 292	FM	<a href="#">Centralia</a>	WA	<a href="#">140751</a>
<a href="#">SUNNYLANDS BROADCASTING, L.L.C.</a>	<a href="#">K253CG</a>	98.5 MHz Ch. 253	FM	<a href="#">Redmond</a>	WA	<a href="#">142725</a>
<a href="#">SUNNYLANDS BROADCASTING, LLC</a>	<a href="#">K237FR</a>	95.3 MHz Ch. 237	FM	<a href="#">Tumwater</a>	WA	<a href="#">140747</a>
<a href="#">SUNNYLANDS BROADCASTING, LLC</a>	<a href="#">NEW(FM)</a>	107.9 MHz Ch. 300	FM	<a href="#">Raymond</a>	WA	<a href="#">198714</a>
<a href="#">SUNNYLANDS BROADCASTING, L.L.C.</a>	<a href="#">KGAY(AM)</a>	1270 kHz	AM	<a href="#">Thousand Palms</a>	CA	<a href="#">14056</a>
<a href="#">SUNNYLANDS BROADCASTING, L.L.C.</a>	<a href="#">K226BT</a>	93.1 MHz Ch. 226	FM	<a href="#">Indio</a>	CA	<a href="#">140886</a>
<a href="#">SUNNYLANDS BROADCASTING LLC</a>	<a href="#">K293CL</a>	106.5 MHz Ch. 293	FM	<a href="#">Thousand Palms</a>	CA	<a href="#">157713</a>
<a href="#">SUNNYLANDS BROADCASTING LLC</a>	<a href="#">KHCV(FM)</a>	104.3 MHz Ch. 282	FM	<a href="#">Mecca</a>	CA	<a href="#">191492</a>

Study Date: 9/09/2021; Study Duration: 0.0011 Seconds.  
Database Sources: 9/9/2021 FCC CDBS,  
09/09/2021 FCC LMS,  
FCC ASR,  
FCC ULS Microwave, and  
FCC ULS Broadcast Land Mobile

## Sunnylands Broadcast Winning Bidder Auction Exhibit

Pursuant to 47 C.F.R. Sections 73.5005(a), Sunnylands certifies that it was NOT a party to any bidding consortia, joint venture, partnership or other agreement or arrangement relating to the competitive bidding process, and it is in compliance with sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b) of the Commission rules.



**September 2021  
New FM Channel 293A  
Raymond, Washington  
Allocation Study**

**Background**

The instant application is being filed by the winning bidder for the Channel 300A allotment at Raymond, Washington, offered as Permit MM-FM1258-A in FM Auction #109. In this case, the winning bidder was also the original allotment proponent, and so this application is filed as an amendment to BNPH-20150824ABA.

This application proposes a non-adjacent channel change from Channel 300A to Channel 293A. Separate allotment and transmitter sites are proposed.

**Allotment Site Spacing Study**

The attached spacing study shows that the proposed Channel 293A allotment site meets the co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules. This site is suitable for tower construction, and encompasses Raymond within the standard Class A 70 dBu contour distance of 16.2 kilometers.

**Transmitter Site Spacing Study**

The attached spacing study shows that the proposed Channel 293A transmitter site meets the co-channel and adjacent channel spacing requirements for Class A stations as prescribed in §73.207 of the Commission's Rules, with the exception of a short-spacing to the licensed operation of KLTH on Channel 294C at Lake Oswego. Processing pursuant to §73.215 of the Commission's Rules is requested with respect to KLTH, and the attached allocation study map is included to demonstrate the lack of prohibited contour overlap with that facility.

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=====
SEARCH PARAMETERS                      FM Database Date: 20210830
Channel: 293A    106.5 MHz                      Page 1
Latitude: 46 46 10.0 (NAD83)
Longitude: 123 51 59.0
Safety Zone: 32 km
Job Title: RAYMOND 293A ALLOTMENT SITE

```

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K291BY LIC	RAYMOND WA	BLFT-20180925ACH	291D 106.1	0.250 0.0	46 41 43.4 123 46 21.6	139.0	10.91 0.00	0 TRANS
K292GZ LIC	ASTORIA OR	BLFT-20160630ABL	292D 106.3	0.250 0.0	46 10 55.0 123 48 14.0	175.8	65.48 0.00	0 TRANS
K292HN LIC	CENTRALIA WA	0000101779	292D 106.3	0.250 0.0	46 43 50.7 123 1 33.7	93.5	64.36 0.00	0 TRANS
KAHS-LP LIC	ABERDEEN WA	BLL-20100615AER	293L1 106.5	0.100 0.0	46 58 49.3 123 49 6.5	8.8	23.73 0.00	0 LPPFM
KWPZ LIC	LYNDEN WA	BMLH-20081008AJR	293C 106.5	68.000 711.0	48 40 45.4 122 50 35.7	19.4	225.79 -0.21	226 SHORT
KOWA-LP LIC	OLYMPIA WA	BLL-20040816AAB	293L1 106.5	0.022 62.0	47 1 14.3 122 57 54.5	67.5	74.14 0.00	0 LPPFM
K293BL LIC	NEDONNA BEACH OR	BLFT-20120904AAJ	293D 106.5	0.010 0.0	45 44 37.3 123 56 28.4	182.9	114.16 0.00	0 TRANS
KLTH LIC	LAKE OSWEGO OR	BLH-20100416AAO	294C 106.7	100.000 502.0	45 30 57.4 122 44 3.4	147.6	164.51 -0.49	165 SHORT
KTYG-LP LIC	CENTRALIA WA	BLL-20170315AAD	294L1 106.7	0.100 6.7	46 44 23.3 122 59 23.3	92.5	67.06 0.00	0 LPPFM
K295BO LIC	ABERDEEN WA	BLFT-20130701ADB	295D 106.9	0.125 0.0	46 59 17.3 123 47 46.5	12.3	24.89 0.00	0 TRANS

===== END OF FM SPACING STUDY FOR CHANNEL 293 =====



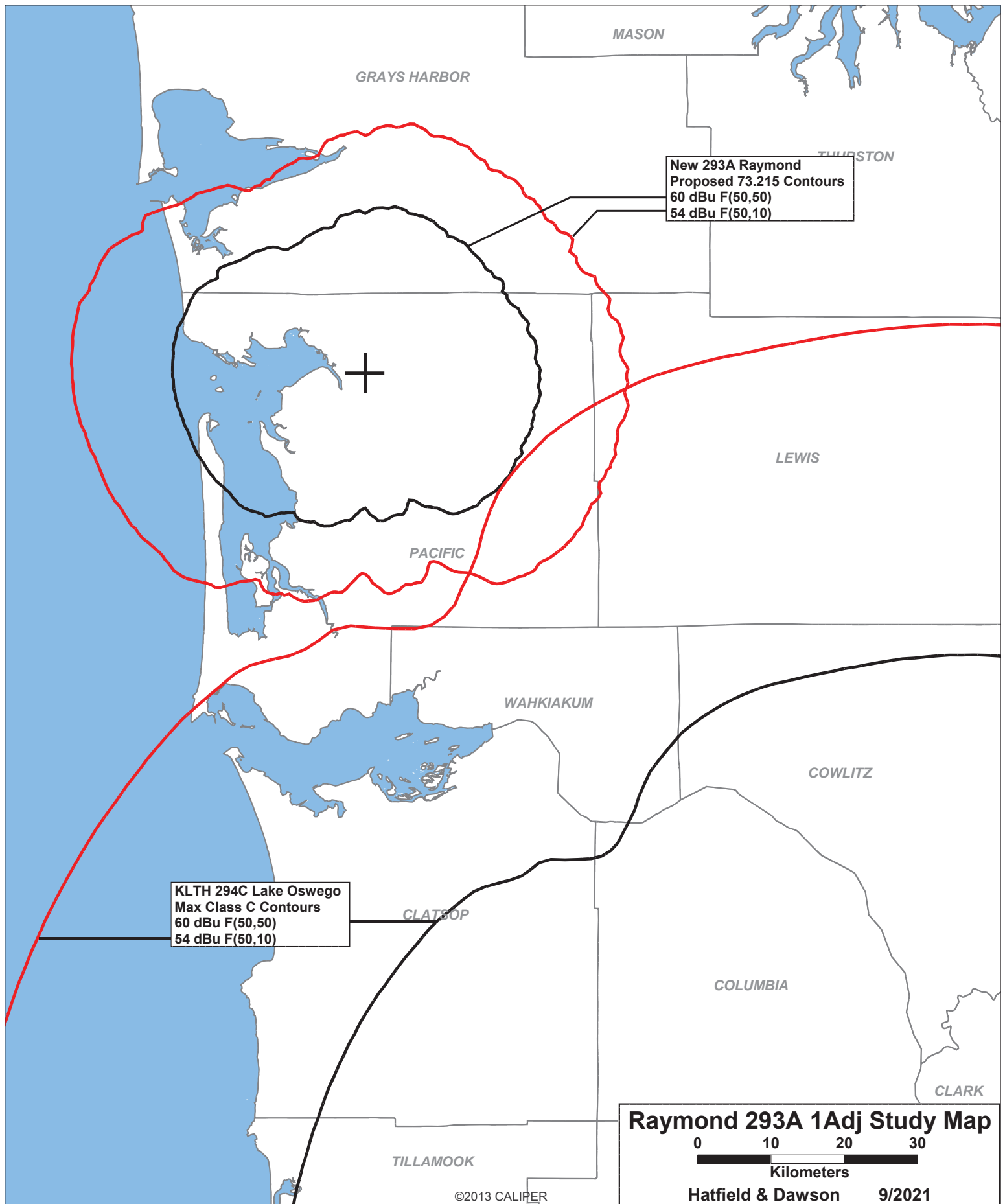
```

=====
SEARCH PARAMETERS                               FM Database Date: 20210830
Channel: 293A    106.5 MHz                      Page 1
Latitude: 46 41 43.0 (NAD83)
Longitude: 123 46 22.0
Safety Zone: 32 km
Job Title: RAYMOND 293A TRANSMITTER SITE

```

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K291BY LIC	RAYMOND WA	BLFT-20180925ACH	291D 106.1	0.250 0.0	46 41 43.4 123 46 21.6	34.4	0.01 0.00	0 TRANS
K292GZ LIC	ASTORIA OR	BLFT-20160630ABL	292D 106.3	0.250 0.0	46 10 55.0 123 48 14.0	182.4	57.11 0.00	0 TRANS
K292HN LIC	CENTRALIA WA	0000101779	292D 106.3	0.250 0.0	46 43 50.7 123 1 33.7	85.8	57.24 0.00	0 TRANS
KAHS-LP LIC	ABERDEEN WA	BLL-20100615AER	293L1 106.5	0.100 0.0	46 58 49.3 123 49 6.5	353.8	31.88 0.00	0 LPFM
KWPZ LIC	LYNDEN WA	BMLH-20081008AJR	293C 106.5	68.000 711.0	48 40 45.4 122 50 35.7	17.2	231.36 5.36	226 CLOSE
KOWA-LP LIC	OLYMPIA WA	BLL-20040816AAB	293L1 106.5	0.022 62.0	47 1 14.3 122 57 54.5	59.2	71.43 0.00	0 LPFM
K293BL LIC	NEDONNA BEACH OR	BLFT-20120904AAJ	293D 106.5	0.010 0.0	DA 45 44 37.3 123 56 28.4	187.0	106.57 0.00	0 TRANS
KLTH LIC	LAKE OSWEGO OR	BLH-20100416AAO	294C 106.7	100.000 502.0	45 30 57.4 122 44 3.4	148.2	153.72 -11.28	165 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 142 KM								
KTYG-LP LIC	CENTRALIA WA	BLL-20170315AAD	294L1 106.7	0.100 6.7	46 44 23.3 122 59 23.3	85.0	60.07 0.00	0 LPFM
K295BO LIC	ABERDEEN WA	BLFT-20130701ADB	295D 106.9	0.125 0.0	DA 46 59 17.3 123 47 46.5	356.9	32.61 0.00	0 TRANS
KRQT LIC	CASTLE ROCK WA	BLH-20081216AAF	296C3 107.1	0.800 523.0	46 20 17.3 123 5 49.4	127.3 SS	65.31 23.31	42 CLEAR

===== END OF FM SPACING STUDY FOR CHANNEL 293 =====



**September 2021  
New FM Channel 293A  
Raymond, Washington  
RF Exposure Study**

**Facilities Proposed**

The proposed operation will be on Channel 293A (106.5 MHz) with an effective radiated power of 0.300 kilowatts. Operation is proposed with a 1-element circularly-polarized omni-directional antenna, which will be mounted on an existing pole on Holy Cross Hill, with FCC Antenna Structure Registration Number 1042448.

**RF Exposure Calculations**

The power density calculations shown below were made using the techniques outlined in OET Bulletin No. 65. "Ground level" calculations in this report have been made at a reference height of 2 meters above ground to provide a worst-case estimate of exposure for persons standing on the ground in the vicinity of the tower. The equation shown below was used to calculate the ground level power density figures from each antenna.

$$S(\mu W / cm^2) = \frac{33.40981 \times AdjERP(Watts)}{D^2}$$

Where: *AdjERP(Watts)* is the maximum lobe effective radiated power times the element pattern factor times the array pattern factor.

*D* is the distance in meters from the center of radiation to the calculation point.

Ground level power densities have been calculated for locations extending from the base of the tower to a distance of 500 meters. Values past this point are increasingly negligible.

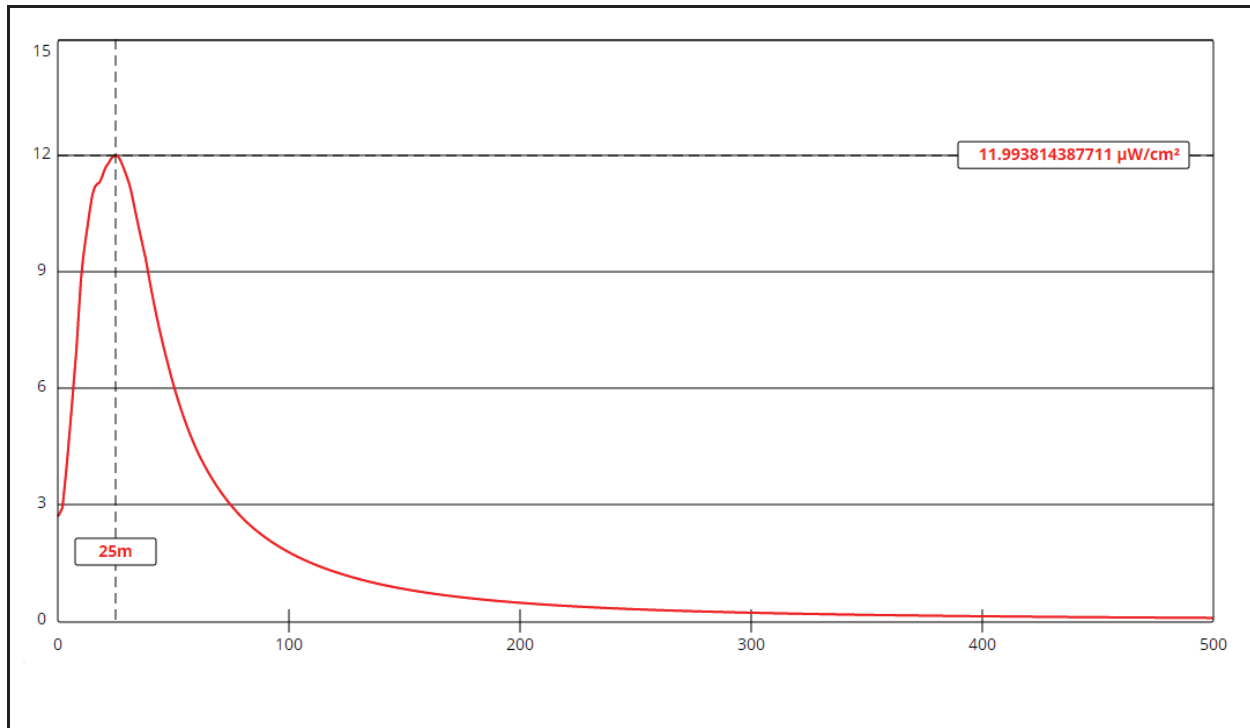
Calculations of the power density produced by the proposed antenna system assume a Type 4 element pattern, which is the appropriate element pattern for the Shively SLV-1 antenna to be used. The highest calculated ground level power density occurs at a distance of 14 meters from the base of the antenna support structure. At this point the power density is calculated to be 85.9 $\mu$ W/cm<sup>2</sup>, which is 43% of 200  $\mu$ W/cm<sup>2</sup> (the FCC standard for uncontrolled environments).

Calculations of the power density produced by Raymond 293A and the other stations at this transmitter site are summarized in the following table:

Call	Avg or Peak ERP Antenna Model	Relative Field	Height AGL	Calculated Max Exposure	Gen Pop FCC Limit	% of Limit
New 293A	0.300 kW H 0.300 kW V SHI SLV-1	FMMModel Type 4	24 m	12.0 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	6.0%
KBSG 211A	0.44 kW H 0.44 kW V SHI SLV-1	FMMModel Type 4	19 m	29.4 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	14.7%
K214FI	0.019 kW H 0.019 kW V SHI 6812C-1	FMMModel Type 1	30 m	1.0 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	0.5%
KACW 217A	0.225 kW H 0.225 kW V PSIFML-1-DA	FMMModel Type 2	11 m	51.0 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	25.5%
K266BL	0.009 kW H 0.009 kW V NIC BKG88-1	FMMModel Type 1	8 m	10.0 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	5.0%
KJET 289C2	13.5 kW H 13.5 kW V PSIFM-4-HWS-DA	FMMModel Type 2	28 m	36.3 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	18.2%
K291BY	0.250 kW H 0.250 kW V BKG77-1	FMMModel Type 2	16 m	23.4 $\mu\text{W}/\text{cm}^2$	200 $\mu\text{W}/\text{cm}^2$	11.7%

These calculations show that the maximum calculated power density produced at two meters above ground level by the operation of Raymond 293A and the other stations at this site (were their maxima to coincide, which they do not) is 163.1  $\mu\text{W}/\text{cm}^2$ , which is 81.6% of 200  $\mu\text{W}/\text{cm}^2$  (the FCC standard for uncontrolled environments).

The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency exposure in excess of FCC guidelines.



## Ground-Level RF Exposure

OET FMModel

### New 293A Raymond

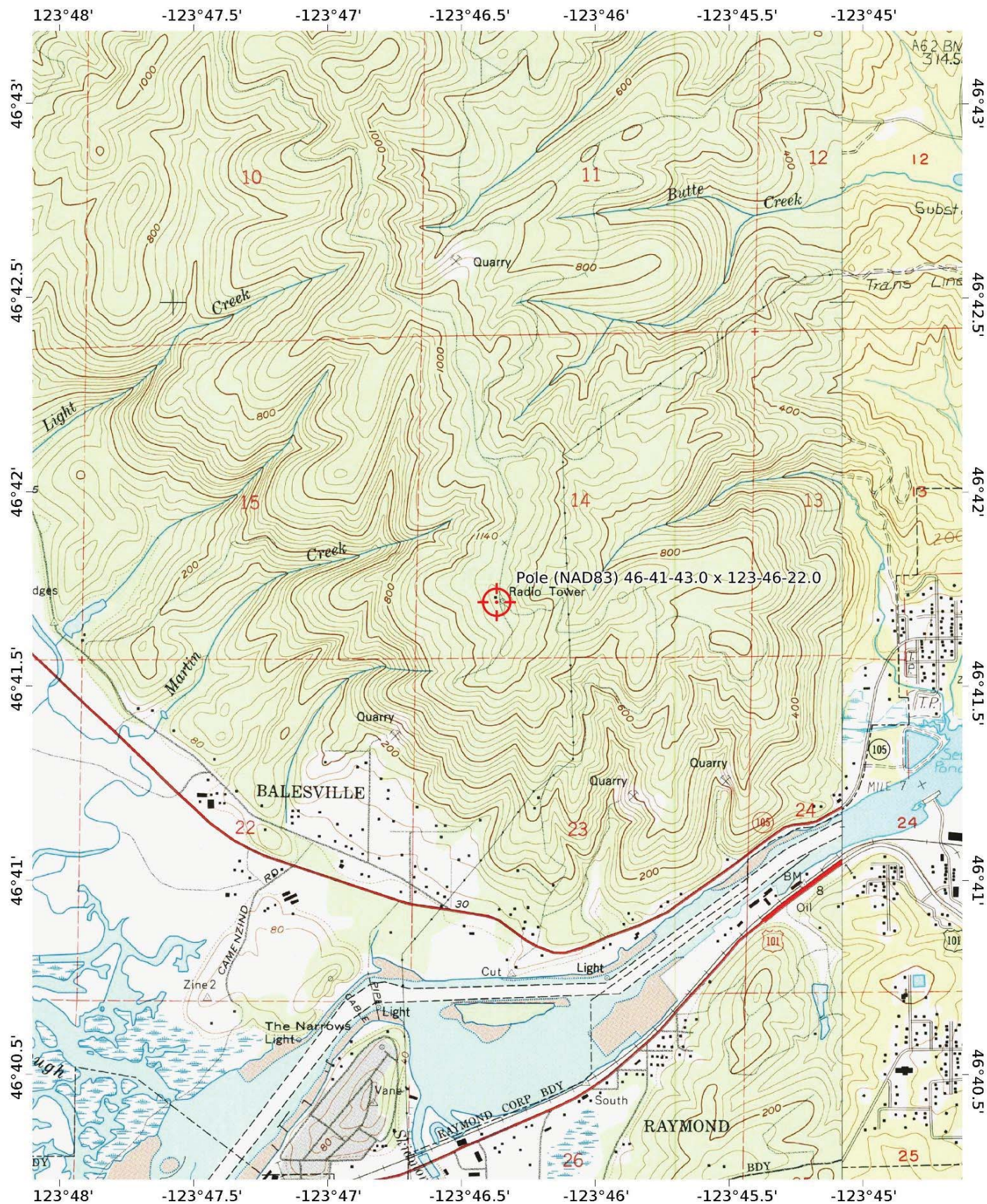
Antenna Type: Shively SLV-1 (Type 4)  
No. of Elements: 1  
Element Spacing: 1.0 wavelength

Distance: 500 meters  
Horizontal ERP: 0.3 kW  
Vertical ERP: 0.3 kW

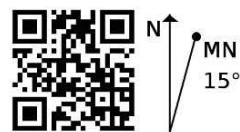
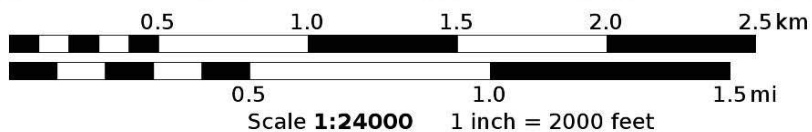
Antenna Height: 24 meters AGL

Maximum Calculated Power Density is 12.0  $\mu\text{W}/\text{cm}^2$  at 25 meters from the antenna structure.





Mercator Projection  
 WGS84  
 USNG Zone 10TDS  
 CALTOPO



Hatfield & Dawson Consulting Engineers



